

EXHIBIT 33

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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MARYLAND SHALL ISSUE, INC., :
et al., :
: Case No:
Plaintiffs : 16-cv-3311-MJG
:
-vs- : Pages 1 - 205
:
LAWRENCE HOGAN, in his :
capacity of Governor of :
Maryland, et al., :
:
Defendants :
-----X

Deposition of James P. Russell, Jr.
Baltimore, Maryland
Monday, June 11, 2018

Reported by: Kathleen M. Vaglica, RPR, RMR
Job No: 409351

MAGNA LEGAL SERVICES
(866) 624-6221

1 A. No, 'cause I get numerous requests, and it
2 then it sends to my e-mail, which is Maryland.gov,
3 and that's how I get responses.

4 Q. Now, as an HQL instructor, do you charge
5 any money?

6 A. I do not. No, sir. I've never charged
7 any money for any of my services that I provide,
8 whether it be HQL, LEOSA, and/or qualification of
9 sworn and civilian personnel.

10 Q. All right. These 25 or 30 individuals
11 that you have certified as instructed under the HQL,
12 how did they come to you for instruction? How did
13 they find you?

14 A. Via e-mail, friends or family, you know,
15 have contacted me in regards to it, associates of
16 places, YMCA that I still continue to hang out, and
17 they talk and know I'm a firearms instructor.
18 Mostly it's just through contacts and acquaintances
19 that I have in Cecil County.

20 Q. And where do you hold classes for HQL
21 instruction?

22 A. Sure. There's three different locations

1 that I utilize, Elk Neck State Park, which is
2 located on Eayrestown Road in Cecil County. It's a
3 state park there.

4 Q. And they have classroom facilities there
5 for you to use?

6 A. Classroom facilities and/or a setting
7 where we can actually, yes, teach and do the
8 classroom portion of it.

9 Q. Okay. Does that cost anything for you to
10 rent?

11 A. No, sir. It's a state park, and I'll say
12 this. Mondays the park is closed to the public, and
13 they allow myself as a firearms instructor to use it
14 on Mondays for those purposes.

15 Q. So --

16 A. Can I? I didn't mean to interrupt.
17 Additionally, I use Broad Creek Range, which is the
18 Harford County Sheriff's Office range.

19 Q. Is that open to members of the public?

20 A. No, sir. That's a closed range for the
21 Harford County Sheriff's Office located on
22 Flintville Road.